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February 26, 2022

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Hayes, et al., No. 20 Cr. 500 (JGK)**

Dear Judge Koeltl:

Pursuant to the Court's order of February 4, 2022, ECF No. 256, Defendant Samuel Reed will be submitting a motion to exclude portions of the government's expert testimony today, February 26, 2022. The full set of papers will be delivered to Chambers in both hard copy and electronic form.

Having previously conferred with the government pursuant to the Court's Individual Practices Rule VI.A.2, we respectfully seek leave from the Court to file the motion and supporting papers under seal at the present time because they reference materials the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case, ECF Nos. 23, 41, 55, and that are irrelevant, prejudicial, and/or otherwise inadmissible. The parties will confer on proposed redactions.

We are available at the Court's convenience to discuss any questions. Thank you.

Respectfully submitted,

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

2/26/22

/s/ Douglas K. Yatter
Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

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cc: Samuel Raymond
Jessica Greenwood
Nathan Rehn
All Counsel of Record (via ECF)